

United States District Court

for the
Western District of New York

United States of America

v.

Case No. 23-mj-1008

SEAN LASKER

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about March 3, 2023, in the Western District of New York, the defendant, SEAN LASKER, did knowingly and intentionally possess with the intent to distribute, cocaine and methamphetamine, both Schedule II controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.

ROBERT MORRIS (Affiliate)

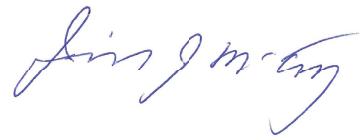
Digitally signed by ROBERT MORRIS
(Affiliate)
Date: 2023.03.03 21:06:15 -05'00'

ROBERT F. MORRIS
TASK FORCE OFFICER
DRUG ENFORCEMENT ADMINISTRATION

Sworn to telephonically.

Date: March 3, 2023

City and State: Buffalo, New York



HONORABLE JEREMIAH J. MCCARTHY
UNITED STATES MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

ROBERT F. MORRIS, being duly sworn, deposes and states:

I. INTRODUCTION

1. I am a Task Force Officer with the Drug Enforcement Administration (DEA).

As such, I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516. As such I am a law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), and I am empowered by law to conduct investigations of, and to make arrests for, the offenses enumerated in Title 18, United States Code, Section 2516.

2. I have served as a DEA Task Force Officer assigned to the Buffalo District Office since June of 2021. In addition to being a TFO with the DEA, I graduated from the Federal Law Enforcement Training Center in Brunswick, Georgia in 2018 after being hired as a Deportation Officer for Immigrations Customs Enforcement / Enforcement and Removal Operations, Buffalo Field Office. I currently hold the position and title as a Deportation Officer. During that time, I have participated in investigations involving drug trafficking matters. In addition, I have had the opportunity to work with several other DEA agents and other law enforcement agents and officers of varying experience levels, who have also investigated drug trafficking networks, with regard to the manner in which controlled substances are obtained, diluted, packaged, distributed, sold and used within the framework of drug trafficking.

3. As a result of my experience, I am familiar with how controlled substances are obtained, diluted, packaged, distributed, sold, and used in the framework of drug trafficking and how drug traffickers utilize wire communications to facilitate their illegal activities. My investigative experience detailed herein, and the experience of other law enforcement agents who are participating in this investigation, serve as the basis for the opinions and conclusions set forth herein. This affidavit is being submitted for a limited purpose, that is, to establish probable cause, and as such, I have not included details of every aspect of this investigation.

4. Your affiant makes this affidavit in support of a Criminal Complaint charging **SEAN LASKER** with violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) (possession of cocaine and methamphetamine with intent to distribute).

5. On March 3, 2023, in the Western District of New York, the Buffalo District Office Tactical Diversion Squad (“DO TDS”) obtained information from a confidential source (“CS”) that LASKER was traveling to Buffalo from New York City for drug trafficking purposes. Through investigative techniques, we determined that LASKER was traveling via bus to the Buffalo, NY area. Upon LASKER’s arrival to Buffalo, I, along with agents from Buffalo DO TDS detained LASKER while awaiting a search warrant for his person. Upon receiving the search warrant, Buffalo DO TDS recovered from the defendant’s person the following:

- a. One (1) cell phone;
- b. 10 suspected counterfeit Xanax tablets;
- c. a black Northface backpack containing approximately 1200 orange oval tablets, believed to be counterfeit Adderall, several sheets of blotter paper containing approximately 200 dosage units of a substance believed to be LSD, several bags containing a green leafy substance believed to be marijuana, several bags containing a beige powdery substance believed to be cocaine, a digital scale;

- d. a blue duffel bag containing additional plastic bags housing a green leafy substance believed to be marijuana, drug packaging material, several bottles containing an unidentified liquid;
- e. a smaller Nike duffel bag housing several bags of a substance believed to be mushroom, additional bags containing a beige powdery substance believed to be cocaine, a digital scale;

6. The orange oval tablets field tested positive for methamphetamine weighing approximately 454.6 grams. The beige powdery substance field tested positive for cocaine weighing approximately 16.3 grams.

7. Based on the weight and packaging of the narcotics recovered, as well as the scales and drug paraphernalia, and based upon my training, education, and experience, I believe that LASKER possessed these narcotics for the purpose of distribution.

WHEREFORE, probable cause exists to believe that SEAN LASKER did violate Title 21, United States Code Section, 841(a)(1), that is, possessing methamphetamine and cocaine with the intent to distribute.

ROBERT MORRIS
(Affiliate)

Digitally signed by ROBERT MORRIS
(Affiliate)
Date: 2023.03.03 21:07:25 -05'00'

ROBERT MORRIS
Task Force Officer
Drug Enforcement Administration

Sworn to telephonically,

this 3rd day of March, 2023.



HONORABLE JEREMIAH J. MCCARTHY
UNITED STATES MAGISTRATE JUDGE